WWR# 040314862

## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: CASE NO. 18-17370-ref

LORI A. TANHOUSER CHAPTER 13

Debtor

Hearing Date: 04/18/2019

PSECU Hearing Time: 9:30 a.m.

Movant

## REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to F.R.C.P. 34, Movant hereby requests that the Debtor produces for inspection by the undersigned attorney for the Movant the following:

- 1. If you deny any or all of the subsections under Movant's Request for admission No. 1:
  - (a) Canceled check, receipt, proof of money order, or other documentation evidencing that the payment due on 11/18/2018-03/18/2019, was tendered to Movant.
- Copies of any and all documents, federal and state court opinions (whether published or unpublished), federal guidelines or other applicable statutory or common law bases upon which you rely in denying Plaintiff's Request for Admission Number 1.

Respectfully Submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

/s/ Brian Langford
Brian Langford
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Attorney for Movant